

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
GREENEVILLE DIVISION**

**S.H., individually, and on behalf  
of all others similarly situated,**

**Plaintiff,**

**v.**

**No: 2:23-cv-00071-TRM-JEM**

**CITY OF JOHNSON CITY, TENNESSEE,**

**Defendant.**

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**UNOPPOSED MOTION FOR EXTENSION OF DATE FOR  
SETTLEMENT ADMINISTRATOR TO SEND CLASS NOTICE**

COMES NOW Plaintiff S.H., individually and as a proposed class representative for all those similarly situated (“Plaintiff”), through her undersigned counsel, to request an extension of the date for the Settlement Administrator, JND Legal Administration (“JND”), to send class notice. The original date set in the Order granting preliminary approval is July 16, 2025. ECF 521 at 8. JND has advised that additional time is needed to complete mailing address verification procedures and quality assurance testing for the settlement website. Accordingly, Plaintiff respectfully requests an additional nine (9) days for JND to send notice, up to and including July 25, 2025. Counsel for the parties have met and conferred and Defendant City of Johnson City, Tennessee (“City”) consents to this extension.

The additional time will not require any other change to the timeline set forth in the Order, and there is no evidence of delay by the Parties, their counsel, or JND. The sole purpose of the extension is ensuring an effective notice program and well-run settlement website. For the reasons described herein, Plaintiff respectfully submits that good cause exists for allowing JND

to send notice on or before July 25, 2025. If the extension is granted, JND will launch the settlement website on the same day it transmits notice.

Date: July 15, 2025

/s/ Elizabeth A. Kramer

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## **CERTIFICATE OF SERVICE**

I HEREBY certify that a copy of the foregoing has been filed and served via the Court's electronic filing system on July 15, 2025 to counsel of record:

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